

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-17-C

IN RE:

Amended Application of Sandhill Connexions, LLC for)
Designation as an Eligible Telecommunications)
Carrier in Certain Census Blocks in Chesterfield)
County for Purposes of Receiving Federal Rural)
Digital Opportunity Fund ("RDOF") Support)
Request for Waiver of S.C. Code Ann. Regs. 103-690.1.B)
and 103-690.C(b))

AMENDED APPLICATION OF SANDHILL CONNEXIONS, LLC FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
AND A REQUEST FOR WAIVER OF
S.C. CODE ANN. REGS. 103-690.1.B AND 103-690.C(b)

Sandhill Connexions, LLC ("Connexions") is seeking designation as an Eligible Telecommunications Carrier ("ETC") for one eligible census block located in one eligible census block group in Chesterfield County, South Carolina ("Funded Area")¹ in order to receive federal universal service support under Sections 214 and 254 of the Communications Act of 1934, as amended ("Act"),² and pursuant to the Federal Communications Commission's ("FCC") Rural Digital Opportunity Fund ("RDOF") Phase I auction. In order to receive funding, Connexions must submit documentation to the FCC that it has been designated as an ETC by the South

¹ See Exhibit A for locations, census block, and census block group. See Exhibit B for map of proposed service area, as awarded in the Rural Digital Opportunity Fund Phase I auction ("RDOF Phase I" or "Auction 904").

² 47 U.S.C. §§ 214 and 254.

Carolina Public Service Commission (“Commission”) in the Funded Area no later than June 7, 2021.³

In support of this Amended Application (“Application”), Connexions respectfully submits as follows:

The name and address of the Applicant are as follows:

Sandhill Connexions, LLC
P. O. Box 519
122 S. Main Street
Jefferson, SC 29718

All correspondence, notices, inquiries, and other communications regarding this Application should be sent to:

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The name, title, address, and telephone number of the person who should be contacted in connection with general management of Connexions is:

C. Lee Chambers
President
Sandhill Connexions, LLC
P. O. Box 519, 122 S. Main Street
Jefferson, SC 29718
Telephone: 843-658-3434
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³ See Public Notice, Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, DA 20-1422 at 7 (rel. Dec. 7, 2020) (“RDOF Closing PN”).

I. Description of Applicant

Connexions is a competitive local exchange carrier (“CLEC”) that provides local exchange services and intrastate exchange access service within the geographical areas specified in Connexions’ CLEC Application.⁴ Connexions is a wholly-owned subsidiary of Sandhill Telephone Cooperative, Incorporated (“Sandhill”), an incumbent local exchange carrier (“ILEC”). As an ILEC, Sandhill is an ETC in its ILEC service area.

The FCC established the RDOF Phase I auction (Auction 904) to award up to \$16 billion through a competitive bidding process to provide 10-year support to service providers that commit to offer voice and broadband services to fixed locations in eligible unserved high-cost census blocks. The RDOF Phase I auction is the second auction to award ongoing high-cost universal service support, following the FCC’s Connect America Fund Phase II auction (Auction 903).

Sandhill participated in the FCC’s RDOF Phase I auction and was deemed a winning bidder for one location in the Funded Area. Sandhill has already filed its application with the FCC to assign its winning bid to Connexions, as permitted by FCC rules. Connexions will submit a long-form application to the FCC for authorization for RDOF Phase I support prior to the FCC’s January 29, 2021 filing deadline. Connexions currently has authority to provide service in Funded Area of Chesterfield County as a CLEC. In this petition, Connexions requests ETC designation for the Funded Area only, which will be given a Study Area Code upon final FCC authorization of RDOF Phase I funding. With this Application, and supporting documents,

⁴ The Commission granted CLEC authority to Connexions on December 7, 2016, authorizing it to provide service in Darlington, Dillon, and Marlboro Counties, as well as parts of Kershaw and Chesterfield Counties, South Carolina, that are outside of Sandhill Telephone Cooperative, Incorporated’s existing authorized service areas.

Connexions seeks an Order from the Commission, which designates Connexions as an ETC in the Funded Area, pursuant to Section 214(e) of the Act.⁵

II. Background

On December 7, 2020, the FCC released the RDOF Closing PN announcing the conclusion of Auction 904.⁶ Areas that will receive support through Auction 904 are locations in census blocks in rural areas that are wholly unserved by fixed voice and broadband at speeds of at least 25 Mbps down and 3 Mbps up (“25/3”). Carriers awarded support in Auction 904 must deploy broadband to the specified number of locations in eligible census blocks in which they bid within a six-year period at the speed tier specified in their bid.

Sandhill participated in Auction 904 and was among the 180 providers listed by the FCC as provisional winners. As an Auction 904 participant, Sandhill bid to provide fixed voice and broadband at 1 Gigabit speeds within the six-year budget period. Because Sandhill identified Connexions in its short-form application, it was able to assign its winning bid by the FCC’s December 22, 2020 “divide bid” deadline. Connexions will receive RDOF Phase I support monthly over a ten-year period based on the amount of its winning bid. Specifically, Connexions will receive \$6,396 over a ten-year period to make its voice and broadband service available, delivering 1 Gigabit broadband to one location in the Funded Area upon completion of certain post-auction requirements. In order to receive funding, Connexions must submit documentation to the FCC that it has been designated as an ETC by the Commission in the

⁵ See 47 U.S.C. § 214(e).

⁶ See Public Notice, Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, DA 20-1422 (rel. Dec. 7, 2020) (“RDOF Closing PN”).

Funded Area no later than June 7, 2021.⁷ Accordingly, grant of this Application is vital for the expansion of high-speed broadband services in rural South Carolina.

III. Authority to Designate Connexions as an ETC for the Funded Area

Pursuant to 47 USC § 214(e)(2),⁸ a state commission may designate a common carrier that meets the requirements of 47 USC § 214(e)(1)⁹ as an ETC for a service area designated by the state commission. A common carrier is defined in 47 U.S.C. § 153(11) as “any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this chapter; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier.”¹⁰ Connexions currently provides telecommunications service as a common carrier and will continue doing so in the Funded Area in which it seeks ETC designation. Additionally, as demonstrated below, Connexions satisfies the requirements of Section 214(e)(1) of the Act for designation as an ETC in the Funded Area.¹¹ Accordingly, the Commission has the authority to designate Connexions as an ETC in the Funded Area.

IV. Connexions Satisfies All the Requirements for Designation as an ETC

Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s Rules require ETCs to, throughout their service areas for which designation is received, (1) offer the services supported by federal universal service support mechanisms, either using its own facilities or a combination

⁷ See RDOF Closing PN at 7.

⁸ See 47 U.S.C. § 214(e)(2).

⁹ See 47 U.S.C. § 214(e)(1).

¹⁰ 47 U.S.C. § 153(11).

¹¹ See 47 U.S.C § 214(e)(1).

of its own facilities and resale of another carrier's services, and to (2) advertise the availability of such services and the charges using media of general distribution.¹²

A. ETCs Must Offer Supported Services Through Their Own Facilities or Through a Combination of Their Own Facilities and Resale

In order to be designated as an ETC, a carrier must offer the services that are supported by universal support mechanisms, which are voice telephony services and broadband service as defined in Section 54.101 of the FCC's Rules,¹³ either through its own facilities or a combination of its own facilities and resale of another carrier's facilities. Section 54.101(a)(1) defines voice telephony services eligible for universal service support as:

services [that] provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.¹⁴

Section 54.101(a)(2) defines broadband Internet access services eligible for universal service support as:

services [that] provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.¹⁵

¹² See 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d)(1) and (2). FCC Rule Section 54.201(e) defines the term "facilities" as meaning "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support" 47 C.F.R. § 54.201(e).

¹³ See 47 C.F.R. § 54.101.

¹⁴ 47 C.F.R. § 54.101(a)(1).

¹⁵ 47 C.F.R. § 54.101(a)(2). FCC Rule Section 54.101(c) requires ETCs "subject to a high-cost public interest obligation to offer broadband Internet access services" to offer broadband services "within the areas where it receives high-cost support."

The FCC has additional build out requirements for carriers that are awarded RDOF Phase I auction support. Pursuant to these requirements, Connexions must be able to provide 1 Gigabit broadband to the single location in the Funded Area within a six-year period.¹⁶

B. Connexions Demonstrates That It Will Offer and Provide Each of the Above-Listed Services Through Its Own Facilities

1. Voice Grade Access to the Public Switched Network or Functional Equivalent

Voice grade access to the Public Switched Network or its functional equivalent is provided by Connexions using its facilities-based network. Users will have equipment installed at their premises, which will enable the user to transmit and receive voice communications, including signaling associated with the transmission and receipt of telecommunications traffic. This will enable users to place and receive voice grade calls to and from other Connexions customers and from all other users on the public switched network. Connexions will provide this voice grade access to its customers through interconnection of Connexions facilities and the public switched telephone network via its IP-Enabled/TDM Metaswitch.

2. Minutes of Use for Local Service Provided at No Additional Charge

Connexions will offer a variety of voice products in the census block of the Funded Area provisionally awarded to Connexions. Connexions currently offers several bundled calling plans and packages that make no distinction between local and long-distance usage. These bundled calling plans offer minutes of use for local service at no additional charge to end users.

3. Access to Emergency Services

Connexions will provide access to emergency services provided by local government or other public safety organizations, such as 911 or enhanced 911 (“E911”). The requirement to

¹⁶ See *Rural Digital Opportunity Fund; Connect America Fund, Report and Order*, WC Docket Nos. 19-126 and 10-90, ¶ 31 (rel. Feb. 7, 2020).

offer access to emergency services applies only “to the extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911 systems.”¹⁷ Connexions satisfies this requirement by providing its customers with access to enhanced emergency services by dialing “911.” As an ETC, Connexions will provide access to emergency services for its customers in remote and currently unserved portions of the census block for which it seeks ETC designation.

4. Lifeline and Toll Limitation Services

Connexions will offer Lifeline discounts to qualifying customers and comply with federal Lifeline requirements in fulfillment of the requirement that ETCs offer Lifeline discounts to qualifying customers. FCC rules generally require ETCs to offer toll limitation services.¹⁸ However, toll limitation service “does not need to be offered for any Lifeline service that does not distinguish between toll and non-toll calls in the pricing of the service.”¹⁹ Because Connexions’ current bundled calling plans do not make a distinction between local and toll calls, Connexions customers have little need for toll limitation service. However, Connexions will offer toll limitation service to address the needs of qualifying low-income customers interested in obtaining a basic voice connection to the public switched network, if so requested. Toll limitation service “denotes either toll blocking or toll control service for eligible telecommunications carriers that are incapable of providing both services” or denotes both toll blocking and toll control service for ETCs that are capable of providing both services.²⁰

¹⁷ 47 C.F.R. § 54.101(a)(1).

¹⁸ See 47 C.F.R. 54.401(a)(2).

¹⁹ *Id.*

²⁰ 47 C.F.R. § 54.400(d). Rule Section 54.400(b) defines toll blocking as “a service provided by an eligible telecommunications carrier that lets subscribers elect not to allow the completion of outgoing toll calls from their telecommunications channel” while Rule Section 54.400(c) defines toll control as “a service provided by an eligible telecommunications carrier

Connexions is able to provide both toll blocking and toll control services, or either of those services, and will provide toll limitation service in the Funded Area.

C. Connexions Will Advertise Its Service Offerings

Connexions commits to advertise the availability of, and charges for, the supported services using media of general distribution, consistent with its existing advertising practices. The advertising will occur through a combination of media channels, such as the local newspapers in each community, website, TV ads and social media. Connexions will advertise these offerings in a manner that is designed to fully inform potential customers of the services available to them, to disclose all associated rates, and to insure that qualifying low-income individuals are informed about the availability and cost of Lifeline programs.

D. Connexions Meets the Additional Eligibility Criteria Adopted by the FCC

The FCC adopted additional criteria that all ETC applicants must satisfy in order to be granted ETC status in its 2005 ETC Order.²¹ The criteria, as set forth in Section 54.202 of the FCC's Rules, require that an ETC applicant must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area; (3) demonstrate its ability to remain functional in emergency situations; (4) demonstrate that it will satisfy consumer protection and service quality standards.²² To the extent applicable, Connexions will meet each of these additional criteria.

that allows subscribers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle." 47 C.F.R. §§ 54.400(b) and (c).

²¹ Federal-State Joint Board on Universal Service, 20 FCC Rcd 6371 (2005) ("2005 ETC Order").

²² See 47 C.F.R. § 54.202(a)(1)-(3).

1. Connexions Certifies That It Will Comply with Service Requirements Applicable to the Support That It Receives

In its 2005 ETC Order, the FCC required that an ETC applicant “make specific commitments to provide service to requesting customers in the service areas for which it is designated as an ETC.”²³ Specifically, the FCC found that

if the ETC's network already passes or covers the potential customer's premises, the ETC should provide service immediately. In those instances where a request comes from a potential customer within the applicant's licensed service area but outside its existing network coverage, the ETC applicant should provide service within a reasonable period of time if service can be provided at reasonable cost by: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting the nearest cell tower; (4) adjusting network or customer facilities; (5) reselling services from another carrier's facilities to provide service; or (6) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment.²⁴

The FCC stated that if an ETC applicant determines that it cannot serve the customer using one or more of these methods, “then the ETC must report the unfulfilled request to the [FCC] within 30 days after making such determination.”²⁵

Connexions hereby certifies that it will comply with the service requirements applicable to the supported voice and broadband services that it will be offering in the Funded Area, including the requirements for the RDOF Phase I auction program. Connexions will submit a certification by a professional engineer as part of its RDOF Phase I long-form application, stating that Connexions’ network is capable of providing voice and data services to customers in the Funded Area and the network capacity can handle the anticipated peak service loads.

²³ See 2005 ETC Order at ¶ 22.

²⁴ *Id.* (footnotes omitted).

²⁵ *Id.*

2. Five-Year Plan for Proposed Improvements or Upgrades Waived

In the Connect American Fund (“CAF”) Phase II auction, the FCC waived its requirement that winning bidders seeking an FCC ETC designation file a five-year improvement plan in connection with CAF Phase II funding requests.²⁶ The FCC found that the more specific measures it had adopted for CAF Phase II recipients to track deployment, including annual reporting of service to geocoded locations and certifications of compliance with benchmark milestones, provided a “more defined yardstick by which to measure their progress towards the universal availability of voice and broadband service in their areas.”²⁷ For Auction 904, the FCC adopted the same flexibility that is had in the CAF Phase II auction with respect to ETC designations.²⁸ Accordingly, Connexions requests that the Commission grant a waiver of similar state regulations for proposed improvements or upgrades.

3. Connexions Will Remain Functional in Emergency Situations

Connexions hereby certifies that it is able to function in emergency situations as set forth in § 54.202(a)(2).²⁹ Connexions’ voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations

²⁶ See Public Notice, *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197, 10-90, DA 18-714 (rel. July 10, 2018) at pp 4-5 (“CAFII PN”).

²⁷ See *id.* at p. 4, footnote 34 (quoting 2016 Rate-of-Return Reform Order, 31 FCC 3087 at 3166, 3168, ¶ 216).

²⁸ *Rural Digital Opportunity Fund*, Report and Order, 35 FCC Rcd 686, ¶ 81 (2020) ([w]e adopt the same CAF Phase II flexibility with respect to ETC designations”)

²⁹ Section 54.202(a)(2) requires an ETC that is designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of maintaining traffic spikes resulting from emergency situations.” 47 C.F.R. § 54.202(a)(2).

as required by Section 54.202(a)(2). Connexions also complies with the FCC's backup power requirements that became effective in 2015.³⁰

4. Connexions Will Satisfy Consumer Protection and Service Quality Standards

In establishing this certification in its 2005 ETC Order, the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."³¹ The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement, and that the sufficiency of other commitments would be considered on a case-by-case basis.³² In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."³³ In the CAFII PN, however, the FCC "also eliminated, for all CAF recipients, the annual reporting obligations associated with both the five-year improvement plan and the consumer protection certification, after determining that such obligations were no longer essential to the Commission's ability to monitor ETC use of support for its intended purpose."³⁴

³⁰ See 47 C.F.R. § 9.20.

³¹ 2005 ETC Order at ¶ 28.

³² *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new services; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

³³ *Id.* at n. 72.

³⁴ See CAFII PN at p. 4 (referencing *Connect America Fund et al., ETCs Annual Reports and Certifications*, WC Docket Nos. 10-90, 14-58, Report and Order, 32 FCC Rcd 5944, 5944-48, paras. 3-14 (2017) (*ETC Reporting Streamlining Order*) ("eliminating requirements relating to the reporting of network outages, unfulfilled service requests, complaints, and pricing and the certification of compliance with applicable service quality standards").

As stated above, the FCC has waived the requirement that winning bidders seeking an FCC ETC designation certify that they will satisfy consumer protection and service quality standards.³⁵ Despite this fact, Connexions hereby certifies that it is complying with applicable service quality standards and consumer protection rules, including complying with Lifeline service standards pursuant to 47 C.F.R. § 54.408, including minimum broadband speed requirements, data usage allowance, and accessibility to Wi-Fi devices.

V. Connexions Will Satisfy Applicable State-Specific ETC Requirements

Commission Regulation 103-690.C. provides the requirements for initial designation as an ETC. The state regulation generally tracked the corresponding federal regulations at the time the state regulation was promulgated in 2008. Since that time, the federal regulations have changed, and some of the state-specific requirements may not be applicable.

Connexions commits to providing service throughout its proposed designated service area to all customers making a reasonable request for service, as required by R. 103-690.C.(a)(1)(A).

For the reasons explained in Section IV.D.2 above, Connexions requests a waiver of the requirement to submit a two-year plan pursuant to R. 103-690.1.B. The Commission may waive a rule or regulation where circumstances indicate that a waiver is appropriate, upon a finding that such waiver is not contrary to the public interest. Connexions respectfully submits that the requirement should be waived in this case. In lieu of filing the two- year plan provided for in Reg. 103-690.1.B, Connexions will make available to the Commission and Office of Regulatory Staff (“ORS”) all reports it is required to file with the FCC in connection with the RDOF Phase I

³⁵ See *id.*

funding for the Funded Area, as described above. Should the Commission determine not to grant the requested waiver, Connexions will provide such a plan as expeditiously as possible.

Connexions has demonstrated its ability to remain functional in emergency situations, as explained in Section IV.D.3 above, in compliance with R. 103-690.C.(a)(2). Connexions has demonstrated that it will satisfy applicable consumer protection and service quality standards, as explained in Section IV.D.4 above, in compliance with R. 103-690.C.(a)(3).

Connexions has demonstrated that it offers a local usage plan at no additional charge to end users. While there is no FCC requirement to demonstrate a local usage plan comparable to one offered by the ILEC in the service area for which Connexions seeks designation, Connexions believes the bundled calling plans it currently offers are comparable to those offered by the ILEC in the area where it seeks ETC designation, including Sandhill's incumbent local exchange areas within Chesterfield and Kershaw counties, and therefore is in compliance with R. 103-690.C.(a)(4).

Attached to this Application, as required by R. 103-690.C.(a)(5)-(7), is the Affidavit of C. Lee Chambers, an officer of Connexions, certifying Connexions' acknowledgement that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area; that Connexions does offer or will offer the services supported by federal universal service support by using its own facilities or a combination of its own facilities and resale of another carrier's services; and that it does or will advertise in a media of general distribution the availability of such services, including Lifeline services and the applicable charges.

VI. Grant of This Application Will Serve the Public Interest

Connexions' designation as an ETC for the Funded Area will allow it to build out unserved areas using federal funding, bringing the benefits of high-speed broadband to these areas. Accordingly, it is in the public interest to designate Connexions as an ETC in the RDOF Phase I Funded Area. Once the Commission grants Connexions' ETC Application and the FCC approves Connexions for funding, Connexions will receive \$6,396 over a ten-year period which it will use "as intended" to provide 1 Gigabit broadband to those residing and working in the Funded Area.

Connexions respectfully requests a waiver of R. 103-690.C.(b) to the extent it would prohibit designation of Connexions as an ETC in an area smaller than a wire center. As described above, the FCC has established a mechanism to ensure the deployment of broadband to unserved areas. It has done so by undertaking a granular analysis, at the census block and location level, to target funding to such areas. The incumbent carrier serving the Funded Area will not receive support for this high-cost location as the FCC had designated support for this census block will be distributed through Auction 904. If the Commission were to deny Connexions the designation it requests at the census block level in order to obtain available federal funding to serve the Funded Area, that area likely would remain unserved. Therefore, it is in the public interest to grant the requested waiver of that portion of R. 103-690.C.(b) that provides that the Commission shall not designate an ETC service area smaller than an entire wire center.

VII. Conclusion and Request for Expedited Review

In order to be eligible for the federal funding available to Connexions under RDOF Phase I, the FCC requires that Connexions submit documentation to the FCC that it has been

designated as an ETC by the Commission in the Funded Area no later than June 7, 2021. For the reasons stated above, granting this Application will serve the public interest by allowing Connexions to use available federal funding to bring robust broadband service to certain unserved areas of the State. Connexions respectfully requests that the Commission grant this Application in an expeditious manner to enable Connexions to meet the FCC's deadline. Finally, Connexions requests that the Commission grant a waiver of the requirement to submit a two-year plan pursuant to R. 103-690.1.B and the prohibition on designating an ETC in an area smaller than a wire center pursuant to R. 103-690.C.(b).

Attached hereto is the sworn Affidavit of C. Lee Chambers, an officer of Connexions, attesting to the truth and accuracy of this Application, and making the certifications required by Commission Regulation 103-690.C.(a)(5)-(7).

Respectfully submitted,



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 February 4, 2021